remove entanglements from yarns prior to/just at the time of weaving the base fabric. As a consequence, the Applicants respectfully submit that JP '740 fails to teach or suggest not only the idea, but the means of achieving a number of entanglements in the filaments of the warp yarn and the weft yarn in the base fabric as being at most 3/m. Therefore, the Applicants respectfully submit that JP '740 is inapplicable both literally and inherently.

The Applicants respectfully submit that, in the absence of the above-mentioned teachings, the base fabric would not inherently contain the number of entanglements recited in Claim 1. In that regard, the rejection speculates that it would be obvious to produce yarns with the least amount of entanglements as possible. The Applicants have already addressed that issue in detail and do not agree that JP '740 teaches or suggests that course of action. In any event, JP '740 is non-enabling for the production of a low number of entanglements. The rejection essentially dismisses that position as unconvincing. The Applicants have accordingly conducted experiments and include copies of separate Declarations of Mr. Taiichi Okada, a co-inventor, and Mr. Tatsuro Mizuki, an author of JP '740. Those Declarations provide the evidence sought in the rejection.

Mr. Mizuki describes the circumstances surrounding JP '740 and what it discloses to one skilled in the art. The number of entanglements was not described in that document. However, Mr. Mizuki provides data as to what the number of entanglements really were. It can be seen that the number of entanglements far, far exceeded the claimed number. In fact, the number of entanglements exceeded the claimed number by an order of magnitude. Thus, it has now been factually demonstrated that JP '740 fails to teach or suggest the Applicants' claimed number of entanglements.

Separately, Mr. Okada conducted several experiments which demonstrate that he could not attain the flattened cross-section yarns whose number of entanglements in the filaments of the yarns in the base fabric was at most 3/m when he used filaments whose number of entanglements in the

filaments of the yarn was 35/m or the maximum tensioning in the warping and wefting was 0.2cN/dtex. The Table in Mr. Okada's Declaration provides the results wherein the number of entanglements were not produced in accordance with the JP '740 teachings. Therefore, the Applicants have also factually demonstrated that JP '740 not only fails to teach or suggest the claimed number of entanglements, but is also non-enabling with respect to the ability to produce the claimed number of entanglements. The Applicants therefore respectfully submit that JP '740 is completely inapplicable to the rejected claims.

Veiga discloses an automotive protective device comprising a woven or non-woven textile substrate having an adhesive prime coat polyurethane layer coated on at least one surface and a solid polymeric film laminated thereto.

On the other hand, the coated base fabric for airbags in the rejected claims has excellent properties in spite of reducing the amount of the applied resin elastomer by controlling the properties of the filaments having flattened cross-sections in the base fabric. Moreover, it is not necessary for this fabric to laminate the polymeric film.

Veiga does not teach or suggest the above effect by using flattened filaments. Also, Veiga does nothing to cure the deficiencies set forth above with respect to JP '740. In other words, even if one skilled in the art were to hypothetically combine Veiga with JP '740, the resulting fabric would still fail to teach or suggest the subject matter of Claims 1, 2, 4 and 5. Withdrawal of the rejection is respectfully requested.

Claims 1, 2, 4, 5 and 11 stand rejected under 35 U.S.C. §103 over the combination of Li with JP '740. The Applicants respectfully submit that hypothetically combining Li with JP '740 fails to teach or suggest the subject matter of those rejected claims.

The Applicants have already established that JP '740 is not applicable. Hypothetically combining Li with JP '740 does not cure those deficiencies of JP '740.

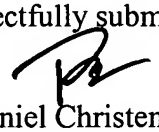
The coated base fabric disclosed by Li et al. is substantially impermeable to air flow when subjected to a pressure of 0.5 inches of water (corresponding to a pressure of 124Pa), which is different from the pressure disclosed by the Applicants.

On the other hand, the coated base fabric for airbags in the rejected claims has a complete air-impermeability, that is "0", at the high pressure of 19.6kPa, in spite of reducing the amount of the applied resin elastomer by controlling the properties of the filaments having flattened cross-section in the base fabric. The coated base fabric for airbags in this Application is favorable for devices that have increased power and are rapidly inflated by gas.

Li et al. does not teach or suggest the above effect by using flattened filaments. Thus, even if one skilled in the art were to hypothetically combine Li with JP '740, the resulting fabrics would still fail to teach or suggest the subject matter as recited in Claims 1, 2, 4, 5 and 11. Withdrawal of the rejection is respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire Application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,



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